

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Paul Schroth Wolfe, Yorkville Investment I, LLC, a Delaware limited liability company, Green Sapphire Holdings, Inc., a Delaware corporation, Alpha Carta, Ltd., a foreign corporation, Breakers Beach Club, Ltd., a foreign corporation, NorthSea, LLC, a Wyoming limited liability company, and Prairie Private Trust Company Ltd., a Cayman Island company,

Plaintiffs,

v.

Steven E. Looper, Paul Schlieve a/k/a Paul Whinnery a/k/a Paul Schmidt, Cyber App Solutions Corp. f/k/a Proton Green, LLC, a Nevada corporation, Proton Green, LLC, a Wyoming limited liability company, Robert G. Brownell a/k/a Robert Bigelow, BNW Family Office, LLC, a Delaware limited liability company, Nathan Smith, Charles Mack, Dallas Salazar, Robert J. Brownell, Sasaginnigak, LLC, f/k/a Overall Builders, LLC, a Texas limited liability company, Global Partners, LLC, a Delaware limited liability company; and John Doe(s) Unidentified Co-Conspirator(s),

Defendants.

Case No.: 24-cv-01538

Honorable John F. Kness

Designated Magistrate Judge  
Honorable Young B. Kim

**Plaintiffs' Notice of Voluntary Withdrawal of Motion for Expedited Discovery Pursuant to Fed. R. Civ. P. 26(d) as to Defendant Mack Only, Pending Voluntary Compliance with Discovery**

1. On June 20, 2024, Plaintiffs filed their Motion for Expedited Discovery Pursuant to Federal Rule of Civil Procedure 26(d), seeking expedited discovery on JPMorgan Chase & Co., and Defendants Steven E. Looper, Cyber App Solutions Corp. f/k/a Proton Green, LLC, Proton Green, LLC, Charles Mack, and Global Capital Partners, LLC (the "Motion"). Dkt. 26.
2. On July 17, 2024, Counsel for Defendant Mack met and conferred with Counsel for Plaintiffs regarding the Motion.
3. Plaintiffs agreed to voluntarily withdraw the Motion, without prejudice, as to Defendant Mack (including Defendant Mack's account records sought from JP Morgan Chase) in exchange for Defendant Mack's voluntary compliance with the requested discovery.
4. Therefore, Plaintiffs hereby voluntarily withdraw their Motion for Expedited Discovery Pursuant to Federal Rule of Civil Procedure 26(d), without prejudice, as to Defendant Charles Mack pending Defendant Mack's voluntary compliance with the requested discovery.
5. Plaintiffs still intend to pursue the Motion to seek discovery from those other than Charles Mack and JP Morgan Chase.
6. Counsel for Charles Mack is in agreement with this relief.

Dated: July 18, 2024

Respectfully submitted,

/s/Thomas E. Patterson  
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Michael Haeberle  
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*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

Cole Hamilton, a non-attorney, certifies that on July 18, 2024, he caused to be electronically filed a true and correct copy of **Plaintiffs' Notice of Voluntary Withdrawal of Motion for Expedited Discovery Pursuant to Fed. R. Civ. P. 26(d) as to Defendant Mack Only, Pending Voluntary Compliance with Discovery** using the CM/ECF system, which will send notification of such filing to all attorneys of record via e-mail.

/s/ Cole Hamilton